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U.S. EPA Pacific Southwest Region

Clean Air Compliance Update

The first issue of a quarterly publication of the Pacific Southwest Region Air Division

PARTNERSHIPS WITH STATE & LOCAL AGENCIES

California Energy Crisis

In January 2001, the governor of California declared energy emergencies related to the anticipated shortfall of energy generation in the West. Governor Gray Davis developed an expedited permit review process through Executive Orders D22-D27 to address the shortfall. In accordance with a directive by President Bush on Feb. 15, 2001, the Air Division worked diligently with California agencies to develop solutions to the energy shortfall that were consistent with the Clean Air Act (CAA) and ensured the continued protection of human health and the environment.

EPA inspectors observe a worker inspecting a turbine shaft at AES's Huntington Beach, Calif. plant in February 2001.

"This past year saw the Air Resources Board and U.S. EPA working together to support efforts by local air districts to implement Governor Davis's Executive Orders addressing the emerging energy crisis in California. As a result of these efforts, we were able to keep the lights on while continuing to improve air quality."

— Mike Kenny, Executive Director, California Air Resources Board

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In addition to an expedited permitting process, our Enforcement Office executed two kinds of administrative actions under limited circumstances. These Administrative Orders on Consent (AOCs) were necessary so that construction at emergency peaking facilities and at gas transmission facilities could begin. While the AOCs expedited construction of facilities to address the energy shortfall, they also protected the environment since the companies were required to install controls for nitrogen oxides. One AOC also permitted an extension to the hours of operation of existing peaking units that were nearing their annual permitted limits on emissions and hours of operation. These units were crucial electric generation units and would only be used as a last resort to prevent a blackout. If the units exceeded their limits, the facility would pay to the local air agency a mitigation fee for the excess emissions to fund pollution offset projects. In total, seven AOCs were issued to various operations: Wildflower Energy (Larkspur and Indigo), the Williams Company, Alliance Colton, Pegasus Power, and Mirant. For more information about energy issues in the Pacific Southwest (Region 9), please visit our website at: **http://www.epa.gov/region09/cross_pr/energy/.**

Fugitive Dust — *Phoenix, Arizona*

The Phoenix metropolitan area is a serious nonattainment area for particulate matter, or PM-10. As such, the state and local air regulatory agencies are required to develop a plan to address the nonattainment problem, which is the result of windblown fugitive dust from a variety of activities that disturb the ground and leave it unstabilized. Fugutive dust sources include construction, unpaved roads and parking lots, disturbed vacant lots, and re-entrained road dust from paved roads. These sources account for as much as 40% of the particulate matter emissions in the area.

Dust at a Kaufman and Broad construction site in April 2000. EPA collected a $28,000 penalty for these violations in February 2001.

The agencies developed a plan which relied heavily on improving dust control at the sources causing the problem. However, the Maricopa County Environmental Services Department (MCESD) needed some assistance in developing its capacity to inspect and enforce these requirements; EPA's approval of its PM-10 plan was contingent on this improved inspection and enforcement capacity. Since the MCESD's dust inspection and enforcement program was understaffed, EPA supported MCESD by performing dust control inspections in the Phoenix metropolitan area, and by taking enforcement actions whenever EPA found violations. This sent the message to the community that both EPA and MCESD considered dust control to be vital to improving public health. This was also the theme of press coverage that accompanied EPA's enforcement actions in the Phoenix area.

Contemporaneous with our compliance activities, we gave the MCESD a one-time grant of $100,000 to assist in hiring inspectors. MCESD eventually increased the number of inspectors devoted to dust control from one to eight, using County funds, and also added an enforcement officer and an attorney from the Maricopa County Attorney's Office. We also conducted training for MCESD – and other Arizona agencies' staff – on dust compliance assurance methods. From April 2000 through December 2001, MCESD completed 9,650 inspections, and took 263 enforcement actions resulting in $615,705 in penalties. In addition, MCESD has been working very closely with the regulated community to provide education about the importance of the dust control regulations to the protection of public health. These efforts by MCESD are significant strides forward in its challenge to control 40% of the particulate matter emissions in the area. This improvement in the agency's performance allowed EPA to propose approval of its PM-10 plan in September 2001.

Community Concerns About Beryllium — *Pima County, Arizona*

"The enforcement action was a collaborative effort that brought diverse perspectives from the federal and local levels toward protecting human health and the environment."

— Ursula Kramer, Director, Pima County Department of Environmental Quality

The Pima County Department of Environmental Quality (PDEQ) is the agency responsible for issuing air quality permits in Pima County. The permit for the Brush-Wellman facility recently came up for renewal. Brush-Wellman uses beryllium, a hazardous material, in the manufacture of parts for the aerospace and defense industries.

Permit issuance for the facility came under fire because the local community raised environmental justice and health and safety concerns. The community was aware that several employees of a Brush-Wellman sister plant in Ohio had died or were ill as a result of exposure to beryllium. The community was concerned that plant emissions were exposing the community, especially children in local schools, to a public health threat.

EPA worked with PDEQ, the Arizona Department of Environmental Quality (ADEQ) and the federal Agency for Toxic Substances and Disease Registry (ATSDR) to investigate the situation. In October 2000, EPA inspected the facility with PDEQ, at its request, and the agencies found several violations during their joint inspection. PDEQ pursued those violations and obtained a $145,000 penalty in August 2001. In addition, ATSDR, ADEQ and PDEQ did soil sampling and air modeling around the facility. Their conclusions were that there was no public health hazard from the facility. However, since exposure did seem to be occurring within the plant, the U.S. Occupational Safety and Health Administration (OSHA) and the National Institute for Occupational Safety and Health (NIOSH) were contacted. NIOSH is currently conducting an epidemiological study of all workers at Brush-Wellman facilities to see if current standards are protective of public health for sensitive individuals.

Air Toxics Training in Hawaii and Nevada

John Brock conducts training in Hawaii.

The Air Toxics program, Section 112 of the CAA, consists of two components: Maximum Achievable Control Technology (MACT) for major and area sources and the risk reduction program. The goal of this program is to reduce emissions of 189 hazardous air pollutants where their emissions, ambient concentrations, bioaccumulation or depositions are known or may reasonably be anticipated to cause adverse effects to human health – such as cancer – or adverse environmental effects. Since the 1990 amendments to the CAA, EPA has promulgated 46 MACT standards, and many more are in development or near completion. The Air Division has been working with state and local air pollution control agencies to build their capacities to implement both aspects of the program. It is critical to ensure that the MACT portion of the program is implemented completely in order to assess accurately any residual risk. The risk portion of the program will examine residual risk and establish methods for its minimization.

As part of our capacity-building activities, we provided training for some of our state, local, and tribal agencies on implementing the MACT regulations. In February 2001, we trained 30 staff at the Hawaii Department of Health, and in May 2001, we trained 25 staff from Washoe County, Nev., the state of Nevada, and several tribes. The training covered an introduction to air toxics and more detailed information on specific MACTs. The training also included conducting joint inspections at MACT sources with our agency partners. EPA plans training for Arizona in early 2002.

California's Chrome Multimedia Inspections Report

In January 2001, the California Environmental Protection Agency completed its report on the results of multimedia inspections of chrome platers in the Los Angeles area. These inspections were conducted during the fall of 1999 and spring of 2000, and the purpose was to verify systematically these facilities' compliance with air, hazardous waste and water regulations, and to determine the effectiveness of coordinated multimedia inspections. The agencies involved in this endeavor included the California Air Resources Board, the Department of Toxic Sustances Control, the State Water Resources Control Board, the South Coast Air Quality Management District and other state and local agencies in the Los Angeles area. Based on the inspections results, the report recommends that the overall compliance rate for this source category should be improved by conducting more frequent inspections, compliance assistance activities, and taking appropriate enforcement action against sources found in violation. EPA's Office of Enforcement and Compliance Assurance (OECA) provided funding for this project, and Region 9 staff participated in the inspections. Copies of the report are available at: **http://www.arb.ca.gov/cd/chromeplating.htm**.

NATIONAL PRIORITIES

Adopt-A-MACT: Chrome Plating

As part of EPA's efforts to implement the Air Toxics program, our Office of Enforcement and Compliance Assurance requested that each region "adopt" a MACT standard to develop compliance assurance tools and serve as the technical expert for other regions and state and local agencies on that MACT. In choosing a MACT, we determined that the Chromium Electroplating MACT was appropriate, since between 1991 and 1997 Region 9 was involved in 11 cleanups of metal finishing facilities totaling more than $9 million in costs. The cleanups removed exposures to highly toxic chemicals in low income or Environmental Justice communities. A focus of this effort was how best to assist small businesses in complying with environmental regulations to prevent future exposures and subsequent cleanups.

Kingsley Adeduro (background) observes while an A-1 Plating operator conducts a surface tension measurement using a stalagmometer, June 2001.

We developed the Adopt-A-MACT Chromium Electroplating Manual for use by EPA inspectors, as well as state and local inspectors and the regulated community. The manual guides inspectors through onsite enforcement and compliance assistance inspections and provides information on Pollution Prevention and Environmental Management Systems (EMS). The manual is being distributed to all Regional Offices and will be used as a training tool in our compliance assistance workshops and outreach.

"The Carrot and the Stick"

A successful melding of compliance assistance and enforcement can be found in Region 9's recent experiences with the Chromium Electroplating MACT. In developing the Adopt-A-MACT materials, we selected Clark County, Nev. as an area to conduct inspections, since it continues to be of concern due to continued and significant growth in population, combined with the unique environmental concerns associated with rapid development in such an arid environment. During a series of inspections, we found 100% non-compliance at chrome electroplating facilities. We issued Administrative Orders to the facilities and provided assistance on how to comply with the MACT. Using this combination of inspections and compliance assistance, the Region has seen all previously inspected sources going from 100% non-compliance to 100% compliance.

"... [W]e will work to promote effective compliance with environmental standards without weakening our commitment to vigorous enforcement of tough laws and regulations. We will offer the carrot when appropriate, and always preserve the stick of enforcement."

– Gov. Christine Todd Whitman in January 17, 2001 testimony before the U.S. Senate's Committee on Environment and Public Works

PSD/NSR National Refinery Initiative

Our Enforcement Office has been actively involved in national settlement negotiations, led by EPA's Office of Enforcement and Compliance Assurance, with BP Corporation and Equilon Enterprises, LLC. The settlement negotiations are focused on the following four marque issues: (1) Prevention of Significant Deterioration/New Source Review requirements (PSD/NSR); (2) Benzene Waste National Emission Standards for Hazardous Air Pollutants (NESHAP); (3) Leak Detection and Repair (LDAR) requirements; and, (4) New Source Performance Standards(NSPS), Subpart J, for sulfur recovery plants and flares.

In Region 9, BP operates a petroleum refining facility in Carson, Calif. As part of the settlement, BP has agreed to use the low-nitrogen oxide (NOx) combustion promoter and NOx absorbing catalyst additives to reduce NOx emissions from the fluid catalytic cracking unit, which converts heavy petroleum distillates to the lighter by-products used to make gasoline. In addition, BP has initiated a 12-month project demonstration of de-sulfur oxide catalysts to reduce sulfur oxide (SOx) emissions from the unit.

BP has also agreed to improve and enhance the Benzene Waste NESHAP compliance and LDAR programs to reduce further benzene emissions from the refinery waste water process and fugitive volatile organic compound (VOC) emissions from the refinery process equipment. The settlement also requires BP to comply with the requirements of NSPS Subpart J for sulfur recovery plants at the Carson refinery. Compliance with NSPS Subpart J will not only reduce sulfur emissions by 98%, but will also provide BP with a marketable sulfur product.

Equilon operates three petroleum refineries in Martinez, Bakersfield and Los Angeles, Calif. As part of the settlement, Equilon will reduce NOx and SOx emissions at the Martinez and Los Angeles refineries by utilizing NOx absorbing catalyst additives and de-SOx catalysts. To reduce fugitive VOC emissions from valves and pumps at these refineries, an enhanced LDAR compliance program which consists of more frequent monitoring, using lower definitions for what is a "leak," and regular auditing of each refinery's LDAR program will be implemented. The Benzene NESHAP compliance program will also be enhanced through comprehensive auditing, regular monitoring, and improved emission controls.

The agreement with Equilon also includes $1.5 million in community-based supplemental environmental projects for communities near Martinez, Bakersfield and Los Angeles.

SUPPLEMENTAL ENVIRONMENTAL PROJECTS (SEPs)

Health Clinic — *Wilmington, California*

As part of a $7 million settlement with EPA in October 2000, Chevron agreed to spend $500,000 on a Supplemental Environmental Project to help build and operate a health clinic in Wilmington, California to diagnose and treat respiratory diseases. The facility will provide medical care to people in the South Coast Air

Basin who have experienced respiratory health problems. As part of another SEP, Chevron also agreed to spend $500,000 to install leakless valves and double-sealed pumps at its El Segundo refinery. These devices are effective at preventing significant emissions of air contaminants. This settlement was a result of Chevron's violations of the State Implementation Plan (SIP) at its offshore loading terminal near El Segundo, Calif. This settlement is expected to achieve an annual reduction of 155 tons of volatile organic compounds (VOCs). As a result of this settlement and other developments, Communities for a Better Environment withdrew its complaint alleging Civil Rights Act violations resulting from emissions trading in September 2001.

Bulk Gas Terminal Controls — *Kauai, Hawaii*

Under an agreement reached with EPA in May 2001, Chevron will spend at least $150,000 toward converting all of the loading racks from top to bottom at its Port Allen bulk gasoline terminal on Kauai, which will significantly reduce VOC emissions. This SEP was part of an $800,000 settlement with Chevron for failing to install air pollution controls and limiting emissions at its Hilo and Kahului bulk gasoline terminals, and failing to inspect and file reports on equipment leaks and wastewater systems at its Kapolei petroleum refinery. Chevron has since installed air pollution controls to limit emissions at its Hilo terminal, will begin installing air pollution controls at its Kahului terminal and has started an inspection program at its Kapolei refinery. This settlement is expected to achieve an annual reduction of 230 tons of VOC.

Emergency Response and Water Recycling Project — *Torrance, California*

Mobil will spend $200,000 to purchase emergency response equipment for the Torrance Fire Department and also spend $800,000 to study and implement water recycling at its southland facility. Recycling will reduce the volume of wastewater released from the refinery and conserve water in our nation's thirstiest metropolitan region. These SEP projects are part of a multimedia settlement EPA reached with the company for violations of the Clean Water Act, Clean Air Act, Emergency Preparedness and Community Right to Know Act and Superfund Law at its Torrance refinery. The Clean Air Act violations result from Mobil's poor maintenance of the essential controls on flare units. In addition to the SEPs, Mobil further paid a $500,000 penalty. This settlement was reached in November 2000.

Emergency Response — *Hawaii*

Brewer Environmental Industries (BEI) in Hawaii agreed in September 2001 to provide supplemental projects of at least $137,000 for equipment to be donated to the county fire departments in Honolulu, Kauai, Maui and Hawaii (Big Island). The equipment was selected in consultation with each of the county fire departments regarding their priority needs. The City and County of Honolulu Fire Department will receive an estimated $11,500 in equipment for such items as a tank patch kit. Estimated costs of equipment for the other counties are as follows: Kauai County $26,500; Maui County $29,500; and, Hawaii County $69,500. Among other items, the county fire departments in Kauai, Maui and Hawaii are each expected to receive thermal imaging devices to be used by hazmat teams for determining volumes in tanks, seeing through smoke and locating plume dispersions. The Hawaii County Fire Department will also receive personal protective equipment and other items to be pre-deployed in Kona. This will enable a faster response by Hilo hazmat responders who are authorized to fly to Kona in emergencies. The protective equipment will include splash suits, air tanks and respirators.

"First Section 112(r) Enforcement Action in Region 9"

These SEPs are part of a multimedia settlement EPA reached with the company for violations of the Emergency Preparedness and Community Right to Know Act and Clean Air Act. The CAA violations included failure to submit adequate risk management plans as required under Section 112(r). The purpose of 112(r) is to prevent the accidental release and to minimize the consequences of any release of extremely hazardous substances. BEI also paid a cash penalty of $98,796.

STRATOSPHERIC OZONE PROTECTION PROGRAM

Sun Wise Initiative

The Sun Wise Initiative is another area of outreach in the Stratospheric Protection Program. This effort is used to educate and distribute information on ozone depletion. What is it? What causes it? How do we stop it? Information on its adverse effects, such as skin cancer, and tips on how to address them and how to be safe in the sun are some of the efforts.

Several of the activities in this effort include the following:

- Sun Wise School Program (a selection of materials/activities that teachers can use in classroom education)
- UV Index Display (the UV index rating is displayed on the jumbo screen at daytime baseball games)
- Sun Wise Day (a day where information and sun screen are distributed via informational booths at events)

EPA's Stratospheric Ozone Protection Program is one of the few air programs that is not delegable to state and local air districts. This means that only EPA can implement and enforce these regulations, which are designed to prevent the destruction of the stratospheric ozone layer caused by emissions of chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and other ozone-depleting substances. These regulations cover an enormous universe of sources, as any facility that has air conditioning or refrigeration is potentially subject to the regulations. Since Region 9 covers the Southwest with its hot, dry climate, this program affects almost all facilities located here to some extent.

EPA has in recent years focused on large, national companies with facilities in multiple regions. These companies often have industrial process refrigeration equipment containing more than 50 pounds of refrigerant, subjecting them to the leak-repair and record keeping requirements of the regulations. The first such large, national case was brought against Meyer's Bakery, which has five facilities in four regions, including one in Region 9. These facilities released thousands of pounds of CFCs through unrepaired appliance leaks. Operators did not conduct leak checks, complete service records or develop a retrofit or replacement plan for leaking systems. EPA settled this case for $3.5 million on Sept. 6, 2000, and this settlement is expected to reduce CFC usage at Meyer's by at least 10,000 pounds.

Air Liquide Settlement

Working together as a team, five EPA regions, led by Region 8, quickly reached a national agreement with Air Liquide, on June 21, 2001, to settle EPA's second CFC national case. Air Liquide, a bottled gas manufacturer, has 22 facilities in 18 states, including 3 facilities in Region 9. EPA charged Air Liquide with violations similar to Meyer's Bakery. The settlement called for Air Liquide to implement significant pollution prevention/reduction projects, including converting all of its industrial process refrigeration systems from ozone-depleting CFCs or HCFCs to systems using alternative, non-ozone depleting refrigerants. The company will also fund an environmental justice supplemental project that will benefit a lower income, predominately minority community in Louisiana, and pay a $4.5 million civil penalty. This settlement is expected to reduce CFC usage at Air Liquide by at least 30,000 pounds.

Stahl unit at Air Liquide's facility in Tucson, Ariz.

Environmental Justice Initiative — *Oakland, California*

The Stratospheric Protection Program has implemented several outreach and compliance assistance initiatives throughout the years. This past year the Stratospheric Protection Team developed an initiative that would determine the rate of compliance in a geographic area and provide any needed compliance assistance materials.

The team targeted 15 small refrigeration service/sales businesses in Environmental Justice areas of Oakland, California. The team conducted site visits and found that almost all were in compliance. The only minor discrepancy was in the area of record keeping. This issue was addressed by providing the businesses with appropriate fact sheets and guidance.

AROUND THE REGION

Arizona: *North Star Steel Company*

On June 22, 2001, the state of Arizona announced that it had settled a complaint with the North Star Steel Company for air quality violations at the company's Kingman steel mill. The $7.75 million settlement, the largest enforcement action in the history of the state's air quality program, resolves the state's civil claims against North Star Steel for constructing and operating the facility without a proper permit, installing and operating unpermitted equipment, failing to test the facility in a timely manner and for multiple violations of permit requirements.

Under the settlement, $2.75 million will be provided to the Mohave County Supplemental Environmental Project Revocable Trust for street paving projects in the Golden Valley area to reduce particulate pollution. In addition to the monetary civil penalties, the settlement also provides that North Star Steel will publicly apologize to the Kingman community, as well as retain an independent third party to conduct multimedia compliance audits annually for three years at the company's Kingman mill and once at its other facilities with electric arc furnaces.

On November 5, 2001, the company pleaded guilty to two criminal charges and agreed to pay $4 million in fines and other penalties for allowing its Kingman steel-recycling plant to knowingly violate clean-air standards. The $4 million to be paid by North Star includes $3.2 million in fines, $425,000 to establish environmental enforcement training, $250,000 to reimburse the state for fees and investigative costs and $125,000 in contributions to a road-paving fund in Kingman.

California: *Applied Energy Services (AES), Alamitos Plant*

The South Coast Air Quality Management District (SCAQMD) reached a $17 million settlement with AES regarding violations of the Regional Clean Air Incentives Market (RECLAIM) program at its Alamitos power plant. AES exceeded its year 2000 nitrogen oxide emissions allocation by about 685,000 pounds for the third quarter of 2000 and was expected to exceed its fourth quarter allocations by about 500,000 pounds. Under terms of the settlement agreement, AES agreed to:

- Pay a total cash penalty to SCAQMD of $17 million;
- Install state-of-the-art air pollution controls on its three power plants;
- Operate its three power plants on the principle of "environmental dispatch" until all air pollution control equipment is installed, using the cleanest units first and the dirtiest last to meet power demand;
- Deduct from its future year allocations this year's excess emissions; and,
- Purchase emission credits as needed to make up for this year's excess emissions.

AES and about 330 other Southland firms are governed by SCAQMD's RECLAIM program, which caps each facility's NOx and SOx emissions at a set amount that declines each year until 2003. While facilities should install pollution controls to keep emissions under their caps, facilities that exceed their caps can purchase credits from others that have stayed under their limits.

ANNOUNCEMENT

EPA Awards Contract to Native American-Owned Company

The U. S. Environmental Protection Agency announces the award of a contract to Portage Environmental Inc. (PEI) to help Indian tribes develop and implement their own air quality programs. The three year contract, awarded on Sept. 17, 2001, is the first contract awarded by EPA's Office of Air and Radiation (OAR) to provide assistance and support to Indian tribes as they begin to implement the Clean Air Act. Portage Environmental Inc. is a Native American-owned firm located in Idaho Falls, Idaho. The company has provided engineering and consulting services to Indian tribes and agencies of the federal government since 1992.

The company will provide a wide range of technical, analytical and administrative support activities to assess, protect and improve air quality in Indian country. EPA's Regional Offices will work with individual Indian tribes and/or tribally-authorized consortia on projects that will be developed through this contract vehicle.

This contract is but one of many efforts initiated by the OAR to help Indian tribes develop the infrastructure, technical expertise and skills to develop, administer and implement their own programs under the Clean Air Act and the Tribal Authority Rule issued in 1998.

Contact Darrel Harmon, U. S. Environmental Protection Agency, 202-564-7416 (harmon.darrel@epa.gov) for further information.

Nevada: *Clark County Health District Reorganizes*

In early 2001, Christine Robinson assumed her responsibilities as the new director of the Air Quality Division at the Clark County Health District. She replaced Michael Naylor who had held that position for more than 20 years. Ms. Robinson came to the Air Quality Division from the Clark County Department of Comprehensive Planning where she was the air quality planning manager. In August 2001, the Air Quality Division was reorganized as the Clark County Department of Air Quality Management. This restructuring placed the air planning and air enforcement and permitting functions under the rubric of the Clark County Board of Commissioners.

Eagle-Picher Minerals Inc. Settlement

On Sept. 19, 2001 the Nevada Division of Environmental Protection/Bureau of Air Quality (NDEP/BAQ) and Eagle-Picher Minerals Inc. (EPMI) agreed to an Administrative Stipulation and Order for the settlement of thirty-six air quality violations issued to EPMI's Clark Plant and Colado Plant, located in Nevada. The settlement agreement requires EPMI to pay a civil penalty of $90,000 and provide funds totaling $92,000 for two Supplemental Environmental Projects. In addition, the agreement contained corrective action measures to ensure compliance with air quality regulations.

NDEP/BAQ had ordered EPMI to conduct source tests at the Colado and Clark Plants after examination of generic data submitted by EPMI that indicated emission limits had been violated. The 36 alleged violations were confirmed by the source test results for exceeding the emission limits and failing to ensure process emissions are controlled through the required air pollution equipment, as stipulated in EPMI's air quality operating permits.

Hawaii: *Asbestos Program Delegation*

On February 15, 2001, the Hawaii Department of Health promulgated the state's new asbestos regulations. The regulations combined the requirements of EPA's Clean Air Act Asbestos NESHAP program as well as the asbestos certification and school requirements implemented under the Toxic Substances Control Act. Asbestos contractors, workers and inspector/consultants will all be certified under the new program. The Hawaii program is the first state/local program in Region 9 to include all EPA asbestos programs under one regulatory authority. The program also combines existing OSHA requirements in a manner that allows regulated industry and the public to comply with all asbestos regulations with the ease of working with one regulatory agency.

COMMENTS – If you have any comments on this issue of the newsletter or interest in other compliance topics, please contact: **Duane James, Chief, Air Enforcement Office, (415) 972-3988, james.duane@epa.gov**

Clean Air Compliance Update

U.S. EPA Pacific Southwest Region Air Division

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